

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LENA DAVENPORT, an adult individual,

Plaintiff,

vs.

BOROUGH OF HOMESTEAD, a Municipal  
Corporation; ET AL.

Defendants.

CIVIL ACTION

No. 2:13-CV-250

Honorable Judge David Cercone

**MOTION TO EXTEND DEADLINES**

Filed on behalf of Defendants Schweitzer,  
Matakovich, Kennedy, Gorecki, Boyko, and  
City of Pittsburgh

**MOTION TO EXTEND DEADLINES**

AND NOW, come the Defendants Schweitzer, Matakovich, Kennedy, Gorecki, and Boyko by and through undersigned counsel, Bryan Campbell, Esq., and file the within *Motion to Extend Deadlines* and in support thereof aver the following:

1. The Court set deadlines on for discovery and pretrial documents on September 18, 2104. (Doc. No. 65).
2. On December 16, 2014, the Court set a status conference for December 23, 2014. (Doc. No. 66).
3. At this status conference, the parties discussed the need to finish depositions to close discovery. Most importantly, the Defendants stated that the deposition of Donald Burris was crucial to finalizing discovery. The parties believed the deposition would occur shortly after Donald Burris's sentencing on January 6, 2015.
4. Donald Burris filed a Complaint for a federal lawsuit on December 17, 2104 at docket number 2:14-cv-1704. The City of Pittsburgh Defendants filed a Motion to Consolidate the within matter with Burris's case on January 27, 2015. That motion has not been decided due to Plaintiffs' counsel opposition.

5. The deposition has not been completed due to Burris's counsel's objection to the deposition. Without this deposition, the Defendants cannot adequately address Plaintiff's claims and support their defenses.

6. The moving Defendants request this Honorable Court extend deadlines for discovery and motions for summary judgment following the scheduling deposition of Donald Burris.

Respectfully submitted,

/s/ Bryan Campbell, Esq.

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 25<sup>th</sup> day of March, 2015, I served the foregoing *Motion to Extend Deadlines* to the following Counsel via CM/ECF Filing System:

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/s/ Bryan Campbell, Esq.  
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